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Attorneys for Plaintiffs and the Certified Subclasses

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

STACIA STINER; RALPH CARLSON, in his capacity as Trustee of the Beverly E. Carlson and Helen V. Carlson Joint Trust; LORESIA VALLETTE, in her capacity as representative of the Lawrence Quinlan Trust; MICHELE LYTLE, in her capacity as Trustee of the Boris Family Revocable Trust; RALPH SCHMIDT, by and through his Guardian Ad Litem, HEATHER FISHER; PATRICIA LINDSTROM, as successor-in-interest to the Estate of ARTHUR LINDSTROM; BERNIE JESTRABEK-HART; and JEANETTE ALGARME; on their own behavles and on behalf of others similarly situated,

Plaintiffs,

V.

BROOKDALE SENIOR LIVING, INC.;  
BROOKDALE SENIOR LIVING  
COMMUNITIES, INC.; and DOES 1 through 100,  
Defendants.

Gay Crosthwait Grunfeld – 121944  
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Case No. 4:17-cv-03962-HSG

**STIPULATION AND ORDER RE:  
SUMBITION OF TRIAL TIME  
ESTIMATE.**

Judge: Hon. Haywood S. Gilliam, Jr.

## STIPULATION

WHEREAS, on August 1, 2024, following a case management conference of that date, the Court issued a minute order which required that the parties submit, among other things, an estimate for the number of hours required by each side to try the injunctive relief claims of the certified subclasses;

7 WHEREAS, the parties have met and conferred and have agreed, subject to this Court's  
8 approval, that additional time is needed to develop accurate trial time estimates in light of the fact  
9 that expert discovery is not yet completed and that the parties are in the midst of preparing for and  
10 taking expert depositions and are engaged in briefing Plaintiffs' Motion to Certify Order for  
11 Interlocutory Appeal and Defendants' Motion to Decertify the Rule 23(b)(2) Access Barrier  
12 Subclass.

13 NOW, THEREFORE, IT IS HEREBY STIPULATED, subject to this Court's approval,  
14 that the deadline for the parties to submit their estimate for the number of hours required by each  
15 side to try the injunctive relief claims of the certified subclasses be extended by 30 days, to  
16 October 3, 2024.

17 IT IS SO STIPULATED.

19 | DATED: August 28, 2024

SCHNEIDER WALLACE  
COTTRELL KONECKY LLP

By: Guy B. Wallace  
Guy B. Wallace

Attorneys for Plaintiffs and the Certified Subclasses

1 DATED: August 28, 2024

MOORE & LEE, P.C.

2 By: Erica Rutner

3 Erica Rutner

4 Attorneys for Defendants

6 **ATTORNEY ATTESTATION**

7 Pursuant to Local Rule 5-1(i)(3), I attest that all other signatures listed, in whose behalf  
8 this filing is submitted, concur in the filing's content and have authorized the filing.

10 DATED: August 28, 2024

SCHNEIDER WALLACE  
COTTRELL KONECKY LLP

12 By: Guy B. Wallace

13 Guy B. Wallace

14 Attorneys for Plaintiffs and the Certified  
15 Subclasses

16 **CERTIFICATE OF SERVICE**

17 I hereby certify that I electronically filed the foregoing document with the Clerk of the  
18 Court for the United States District Court, Northern District of California, by using the Court's  
19 CM/ECF system on August 28, 2024.

20 I certify that all participants in the case are registered CM/ECF users and that service will  
21 be accomplished by the Court's CM/ECF system.

22 Dated: August 28, 2024

/s/ Guy B. Wallace

23 Guy B. Wallace

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## ORDER

2 The Court, having considered the above Stipulation of Plaintiffs and Defendants, and good  
3 cause appearing therefor, IT IS HEREBY ORDERED that the deadline for the parties to submit  
4 their estimate for the number of hours required by each side to try the injunctive relief claims of  
5 the certified subclasses is extended by 30 days to October 3, 2024.

6 Good cause appearing, IT IS SO ORDERED.

8 | DATED: 8/29/2024

Hon. Haywood S. Gilliam, Jr.  
United States District Judge